

NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP
STEPHEN N. ROBERTS (SBN 062538)
KATRINA J. LEE (SBN 191142)
SOPHIE N. FROELICH (SBN 213194)
50 California Street, 34th Floor
San Francisco, California 94111-4799
Telephone: (415) 398-3600
Facsimile: (415) 398-2438
gliddencase@nossaman.com

Attorneys for Plaintiffs
JODY GLIDDEN, MICHAEL LEBLANC
AND TRISH GLIDDEN

DANIEL J. BERGESON (SBN 105439)
CAROLINE MCINTYRE (SBN 159005)
KRISTEN H. LEE (SBN 225574)
BERGESON, LLP
303 Almaden Blvd., Suite. 500
San Jose, CA 95110-2712
Telephone: (408) 291-6200
Facsimile: (408) 297-6000
Email: cmcintyre@be-law.com
Email: dbergeson@be-law.com
Email: klee@be-law.com

Attorneys for Defendants
SKILLSOFT PLC, DAVID C. DRUMMOND, AND
GREGORY M. PRIEST

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JODY GLIDDEN, MICHAEL LEBLANC AND
TRISH GLIDDEN,

Plaintiffs,

vs.

SKILLSOFT PLC (FKA SMARTFORCE PLC);
SLATE ACQUISITION CORP.; DAVID C.
DRUMMOND; GREGORY M. PRIEST;
PATRICK E. MURPHY; AND JACK HAYES,

Defendants.

Case No: C-04-4913-CRB

**STIPULATION AND [PROPOSED] ORDER
INFORMING COURT OF TERMINATION
OF MEDIATION AND SETTING BRIEFING
SCHEDULE**

On May 17, 2005, pursuant to a stipulation among the parties, the Court ordered ("May 17 Order") that defendants need not file their response to the Amended Complaint, pending a mediation. Pursuant to the Order, if there was no settlement, any motion to dismiss was to be filed within 14 days of the termination of the mediation, and pursuant to an agreed briefing schedule. Further, the parties were ordered to inform the Court of the results of the mediation.

This stipulation hereby informs the Court that the mediation was held on Monday, July 18, 2005, but terminated that day without the parties settling. Subsequently, on August 11, 2005, defendants replaced their counsel, Wilson Sonsini Goodrich & Rosati LLP, with Bergeson LLP.

The parties agree to the following proposed briefing schedule for any motion to dismiss/motion to strike:

August 22, 2005 Motion to Dismiss

September 9, 2005 Opposition brief

September 16, 2005 Reply brief

October 14
September 30, 2005 Hearing Date

The parties respectfully request that the Court order the briefing schedule set forth above.

IT IS SO STIPULATED.

Dated: August 12, 2005

NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP
STEPHEN N. ROBERTS

/ S /

By: _____
STEPHEN N. ROBERTS

Attorneys for Plaintiffs
JODY GLIDDEN, MICHAEL LEBLANC
AND TRISH GLIDDEN

Dated: August 12, 2005

BERGESON, LLP
DANIEL J. BERGESON
CAROLINE McINTYRE

/ S /

By: _____
CAROLINE McINTYRE

Attorneys for Defendants
SKILLSOFT PLC, DAVID C. DRUMMOND, AND
GREGORY M. PRIEST

1 **ATTESTATION** I, Stephen N. Roberts, am the ECF User whose identification and password are being
2 used to file this document. In compliance with General Order 45.X.B, I hereby attest that Caroline
3 McIntyre has concurred in this filing.

4 /S/

5 Stephen N. Roberts

6
7
8 IT IS SO ORDERED.

9 Dated: August 15, 2005

